

**CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C.**

**COUNSELLORS AT LAW**

CHARLES C. CARELLA  
BRENDAN T. BYRNE  
PETER G. STEWART  
ELLIOT M. OLSTEIN  
JAN ALAN BRODY  
JOHN M. AGNELLO  
CHARLES M. CARELLA  
JAMES E. CECCHI

JAMES T. BYERS  
DONALD F. MICELI  
A. RICHARD ROSS  
CARL R. WOODWARD, III  
MELISSA E. FLAX  
DAVID G. GILFILLAN  
G. GLENNON TROUBLEFIELD  
BRIAN H. FENLON  
LINDSEY H. TAYLOR  
CAROLINE F. BARTLETT

**5 BECKER FARM ROAD  
ROSELAND, N.J. 07068-1739  
PHONE (973) 994-1700  
FAX (973) 994-1744  
www.carellabyrne.com**

RICHARD K. MATANLE, II  
FRANCIS C. HAND  
AVRAM S. EULE  
RAYMOND W. FISHER  
\_\_\_\_\_  
OF COUNSEL

RAYMOND J. LILLIE  
WILLIAM SQUIRE  
ALAN J. GRANT\*  
STEPHEN R. DANEK  
DONALD A. ECKLUND  
MEGAN A. NATALE  
AMANDA J. BARISICH  
ZACHARY S. BOWER+  
MICHAEL CROSS  
\*MEMBER NY BAR ONLY  
+MEMBER FL BAR ONLY

JAMES D. CECCHI (1933-1995)  
JOHN G. GILFILLAN III (1936-2008)

August 2, 2013

**Via ECF**

The Honorable Steven C. Mannion  
United States Magistrate Judge  
Martin Luther King, Jr. Federal Building  
50 Walnut Street  
Newark, NJ 07102

Re: *Plumbers and Pipefitters Local 572 Health and Welfare Fund*  
*v. Novartis Pharm. Corp.*  
Consolidated Civil Action No. 12-1403 (ES) (SCM)

Dear Judge Mannion:

We are Interim Co-Lead Class Counsel in the above matter. We write jointly with Counsel for defendant Novartis Pharmaceuticals Corp. to request an adjournment of the August 20, 2013 conference call with Your Honor.

Pursuant to the Stipulation and Order (D.E. # 91) entered on June 21, 2013, Plaintiffs will file their Amended Complaint on August 16, 2013. The deadline to produce certain expedited discovery is August 30, 2013. Defendant's motion to dismiss is due on September 30, 2013, with Plaintiff's opposition expected on October 30, 2013, and Defendant's reply on November 20, 2013. Given the briefing schedule, and that discovery, other than designated priority discovery, has been deferred by the June 21 Stipulation and Order until after the Court's decision on the motion to dismiss, we respectfully request that the status conference be postponed.

If it is acceptable to the Court, kindly "So Order" this letter, and have a "filed" copy returned to us via the Court's ECF system.

The Honorable Steven C. Mannion

August 2, 2013

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Thank you for your attention to this matter. If the Court has any questions, we are available at your convenience.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO

/s/ James E. Cecchi

JAMES E. CECCHI

cc: Counsel of Record (by ECF)